

Akin Gump

STRAUSS HAUER & FELD LLP

KATHERINE M. KATCHEN

+1 215.965.1239/fax: +1 215.965.1210
kkatchen@akingump.com

October 10, 2018

VIA ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: MDL 1358 / MTBE, New Jersey Department of Environmental Protection, et
al. v. Atlantic Richfield Co., et al., No. 1:08-cv-00312-VSB

Dear Judge Broderick:

We represent newly-added defendants Lukoil North America LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil (“newly-added Lukoil Defendants”), which entities were added as Defendants in the above-referenced litigation by the Court’s Order of September 28, 2018, granting leave to file a Fifth Amended Complaint.

The newly-added Lukoil Defendants respectfully request an extension of time through November 30, 2018, in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Existing Defendants Lukoil Americas Corporation and Getty Petroleum Marketing Inc., represented by Matthew G. Parisi of Bleakley Platt & Schmidt, LLP, join in this request for an extension.

We have conferred with counsel for Plaintiff, and they have no objection to this extension.

The Parties have signed the enclosed stipulation, and we respectfully request your signature on the enclosed “Stipulation and [Proposed] Order.”

Respectfully,



Katherine M. Katchen

Akin Gump
STRAUSS HAUER & FELD LLP

cc: All Counsel of Record (via LNFS)